

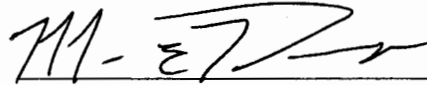
AFFIDAVIT

I, Mark Persson, being sworn, depose and state as follows:

1. I am a Special Agent with the United States Drug Enforcement Administration. I have had this position since September 2014. Prior to working at the DEA I was employed by the Stafford County (Virginia) Sheriff's Office in various law enforcement positions, most recently as a Detective. I have received special training in narcotics investigations, and enforcement. I have also participated in investigations relating to the possession and distribution of controlled substances, including heroin.
2. This affidavit is submitted to show probable cause to believe that on or about December 3, 2014, Wayne Carson, knowingly and intentionally possessed with intent to distribute heroin, a schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1). The facts in this affidavit come from my personal observations and knowledge, my training and experience, and information obtained from other agents, other law enforcement personnel, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the offenses charged and does not set forth all of my knowledge about this matter.
3. On or about December 2 and 3, a person associated with the DEA, who had previously obtained heroin and crack cocaine from Wayne Carson, spoke with Carson over the telephone in the hope of arranging the purchase of 600 bags of heroin and \$1000 worth of cocaine from Carson. These communications were recorded. During the course of these communications Carson and his customer agreed to do the transaction at the McDonald's located on Shelburne Road in South Burlington, Vermont. In anticipation of Carson's arrival at that location, several agents (including myself) and task force officers took up surveillance positions at the McDonald's.
4. Shortly before 4pm on December 3, 2014, I observed a maroon Subaru wagon bearing New York license plates at the McDonalds. Carson was observed (by other agents) getting out of the front passenger seat of the car and walked into the McDonald's. Shortly thereafter Carson was arrested. The vehicle he was travelling in was searched. Within the vehicle, on the front seat passenger floor, agents found what was recognized to be 60 bundles of heroin (a bundle being 10 individual dosage bags), and 10 separate bags of cocaine.
5. I took possession of the above-described drugs at the DEA office, and conducted a field test of one bag of suspect heroin and one bag of suspect crack cocaine. The bags tested positive for heroin and cocaine respectively.

6. After his arrest Carson was advised of his Miranda rights, and signed an acknowledgment and waiver of those rights. During the subsequent interview, he admitted to bringing the drugs up to Vermont for sale and that he was selling drugs to support his own drug habit and to support his family.

Signed and sworn to before me this 4th day of December, 2014.

A handwritten signature in black ink, appearing to read 'M. Persson', written over a horizontal line.

Mark Persson, DEA Special Agent

A large, stylized handwritten signature in black ink, appearing to read 'John M. Conroy', written over a horizontal line.

John M. Conroy

United States Magistrate Judge